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DEPT. OF TRANSPORTATION
DOCKETS

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February 10, 2003

Mr. Paul Wasserman
Director, Office of Great Lakes Pilotage
Commandant (G-MW-1)
U.S. Coast Guard
2100 Second Street
Washington, DC 20593-0001

4306-2002-11288-53

RE: USCG-2002-11288 Rates for Pilotage on the Great Lakes

Dear Mr. Wasserman:

I have been patient for most of a decade while the Great Lakes Pilotage Office under the misdirection of former pilotage directors has issued erroneously low and punitive rates. This has year after year unfairly affected the Lakes Pilots operations and unfairly wage and his extremely pleased that the United States Coast Guard on January 23, 2003 has finally come out with a has proposed rate.

Although this proposed rate is defective in part (as will be pointed out by Lakes Pilots comments to the rate and by the expected USCG bridge hour review), this new rate is a least a start to help American pilots operate their business properly, safely and with greater flexibility and forethought. It will also help begin the needed increases in compensation to the plots to pay them fairly and as required by law and to allow them to plan and meet their mortgages, automobile purchases and college expenses.

I ask that the rate with the needed corrections as requested by Lakes Pilots Association, Inc. be implemented by March 18, 2003, the start of the new shipping season. However, if the needed corrections cannot be made timely, it is imperative that the new rate though flawed be in place as of the beginning of the season with the corrections made as soon as possible thereafter. A delay in implementing the improved rate (though flawed) should not occur simply because corrections may require more time. Any delay in implementing the rate would unfairly deprive Lakes Pilots of justifiable revenues with those revenues lost forever and continue to compound the past failures to put fair rates in place and further penalize individual pilots.

Sincerely,

Wayne A. Coulston
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